

1 THE HONORABLE BENJAMIN H. SETTLE
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 HP TUNERS, LLC, a Nevada limited liability) No. 3:17-cv-05760 BHS
11 company,)
12 Plaintiff,)
13 vs.)
14 KEVIN SYKES-BONNETT and SYKED)
15 ECU TUNING INCORPORATED, a)
16 Washington corporation,)
17 Defendants.)
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18 Pursuant to LCR 5(g) and Section 4.4 of the Protective Order (*see* Dkt. 39), Defendants
19 Kevin Sykes-Bonnett, John Martinson, and Syked ECU Tuning, Inc. (“Defendants”) by and
20 through its counsel, respectfully requests that the Court seal the Kendrick Declaration, and
21 Exhibits A and B of the Kendrick Declaration in support of Defendants’ Reply in Support of its
22 Motion to Compel Production. Under the Protective Order, Plaintiff HP Tuners, LLC
23 (“Plaintiff”) designated these documents as Confidential and Defendants do not oppose that
24 confidentiality designation. Further, the Kendrick Declaration quotes directly from both
25 confidential documents. The private interests of both Defendants’ and Plaintiff of protecting
26 their trade secrets outweigh any interest that the public may have in knowing the contents of
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DEFENDANTS’ MOTION TO SEAL
KENDRICK DECLARATION - 1
No. 3:17-cv-05760 BHS

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1 these exhibits. *See* LCR 5(g)(3)(B). Additionally, there is no less restrictive alternative for
2 protecting the contents of these exhibits because the confidential information contained within
3 them is the subject of Defendants' Motion for a Temporary Restraining Order. *Id.*

4 In accordance with LCR 5(g)(3)(A), counsel for the parties previously met and conferred
5 in connection with this motion to seal on September 7, 2018.
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7 DATED: September 7, 2018
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22 Attorneys for Defendants Kevin Sykes-
23 Bonnett, John Martinson and Syked ECU
24 Tuning Incorporated
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CERTIFICATE OF SERVICE

2 I hereby certify that on September 7, 2018 I electronically filed the above with the Clerk
3 of the Court using the CM/ECF system. In accordance with their ECF registration agreement and
4 the Court's ruling, the Clerk of the Court will send email notification of such filing to the following
5 persons:

6 **Attorneys for Plaintiff HP TUNERS, LLC**

7 by **CM/ECF**
8 by **Electronic Mail**
9 by **Facsimile Transmission**
10 by **First Class Mail**
11 by **Hand Delivery**
12 by **Overnight Delivery**

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13 **Attorneys for Plaintiff HP TUNERS, LLC**

14 by **CM/ECF**
15 by **Electronic Mail**
16 by **Facsimile Transmission**
17 by **First Class Mail**
18 by **Hand Delivery**
19 by **Overnight Delivery**

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21 Executed on September 7, 2018, at Seattle, Washington.

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23 s/Kathi Milner
24
25
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Kathi Milner, Legal Assistant